Approved by OMB[1]
Control No.: 3150-0183
Expires: 02/28/2023

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM
QUESTIONNAIRE FOR THE STATE OF TEXAS

Reporting Period: February 10, 2018 – March 4, 2022

Note: If there has been no change in the response to a specific question since the last IMPEP questionnaire, the State or Region may copy the previous answer, if appropriate.

A. GENERAL

1. Please prepare a summary of the status of the State's or Region's actions taken inresponse to each of the open recommendations from previous IMPEP reviews.

Open Recommendations

2018 IMPEP Final Report

Recommendation #1: Texas should develop and implement a plan to ensure that inspectors performing Yttrium-90 inspections get additional training in this area including accompanying experienced inspectors. (Section 3.3)

This applies to DSHS and not TCEQ because it relates to Section 3.3.

Recommendation #2: Texas should develop and implement an action plan to reduce the licensing renewal backlog. (Section 3.4)

This applies to DSHS and not TCEQ because it relates to Section 3.4.

Recommendation #3: Texas should review and update the recently developed formal training and qualification program to identify the training needs of the low-level radioactive waste and uranium recovery programs and ensure it meets the essential objectives of IMC 1248 and apply it to staff currently going through the qualification process. (Sections 4.3 and 4.4)

At the time of the 2018 IMPEP review, TCEQ had a formally documented training program for the Low-Level Radioactive Waste (LLRW) and Uranium Recovery programs; however, the team at that time determined that the training program should be revised to be more comprehensive. Over the next year, TCEQ developed a more comprehensive version of the training program. This effort took considerable time and resources. The initial revision to the training manual was completed on January 29, 2020. The COVID-19 public health emergency delayed administering the updated training as the TCEQ had immediately moved into a remote work posture by March 2020. Another revision to the training manual was made in February 2021. Staff received the updated training on September 15, 2021.

Recommendation #4: Texas should revise its low-level radioactive waste and uranium recovery program inspection procedures to specify that inspection results will be communicated to licensees within 30 days of the completion of an inspection. Additionally, Texas should ensure that future inspection results are sent to licensees within 30 days of the completion of an inspection. (Sections 4.3 and 4.4)

To address the above recommendation, the Commission revised its LLRW Disposal Program and Uranium Recovery inspection procedures on March 30, 2018, to specify that inspection results will be communicated to licensees within 30 days of the completion of an inspection. Additional language was added to the inspection procedures as follows: The investigator(s) will make every reasonable effort to adhere to this deadline, unless the deadline cannot be met due to holidays, unexpected circumstances, or other priorities. The investigator(s) will document and discuss the reasons for not meeting the deadline with Critical Infrastructure Division (CID) Management.

[1] Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the Records Management Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0183), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

Recommendation #5: Texas should provide training to its staff on the newly revised licensing standard operating procedures to ensure consistency in low-level radioactive waste and uranium recovery licensing actions. (Section 4.3 and 4.4)

The initial awareness training for all Low-Level Radioactive Waste (LLRW) and Uranium Recovery licensing staff was provided to staff on January 31, 2020. TCEQ then began revising the Standard Operating Procedures (SOP) as needed to communicate information more clearly and effectively. This is an ongoing process, and as SOPs are identified and updated, training is provided to staff on each updated SOP. SOP training is part of the required training for all new staff.

B. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

2. Please provide the following organization charts, including names and positions:

(a) A chart showing positions from the Governor down to the Radiation ControlProgram Director;

See Appendix A

(b) A chart showing positions of the radiation control program, includingmanagement; and

See Appendix B for the Radioactive Materials Division
See Appendix C for the Office of Compliance and Enforcement
See Appendix D for the Critical Infrastructure Division

(c) Equivalent charts for sealed source and device evaluation, low-level radioactive waste and uranium recovery programs, if applicable.

Sealed Source and device evaluation is not under TCEQ jurisdiction

See Appendix B for the Low-Level Radioactive Waste and Uranium groups

3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials program by individual. Include the name, position, and, for Agreement States,the fraction of time spent in the following areas: administration, materials licensing & compliance, emergency response, low-level radioactive waste, uranium recovery, other.If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program.

If consultants were used to carry out the program's radioactive materials responsibilities,include their efforts. The table heading should be:

Name Position Area of Effort FTE%

The current (as of January 31, 2022) staffing plans for the Radioactive Materials (RM) Section and for the Critical Infrastructure Division (CID), Radioactive Materials Compliance Program are presented in Tables 1 and 2 below. The table gives a breakdown of the approximate time in percent spent by each staff member for various activities.

Table 1: Current RM Section Staffing Plan

Name	Position	Area of Effort	FTE%[2]
Ashley Forbes	Deputy Director	Administration LLRW UR Other	50 20 20 10
Alisha Stallard	RMD Special Assistant & Health Physicist	Administration LLRW UR Other	50 20 20 10
Brad Broussard	RMD Technical Specialist & Health Physicist	Administration LLRW UR Other	15 45 25 15
Gehan Flanders	RM Section Manager	Administration LLRW	50 20

Table 1: Current RM Section Staffing Plan			
Name	**Position**	**Area of Effort**	**FTE%[2]**
		UR Other	20 10
Vacant	Program Coordinator	Administration LLRW UR Other	30 30 30 10
Hans Weger	Work Leader & Health Physicist	Administration LLRW UR Other	15 75 5 5
Lee Line	Acting Work Leader & Engineer	Administration LLRW UR Other	15 5 75 5
John Haygood	Health Physicist	LLRW UR Other	45 45 10
Caitlin Kurwitz	Health Physicist	LLRW UR Other	45 45 10
Ben Wishert	Environmental Permit Specialist	LLRW UR Other	45 45 10
Molly Coffman	Engineer	LLRW UR Other	25 65 10
Yaneth Gamboa	Health Physicist	LLRW UR Other	45 45 10
Zhenwen Jia	Engineer	LLRW UR Other	25 65 10
Vaishali Tendolkar	Health Physicist	LLRW UR Other	45 45 10
Kan Tu	Geoscientist	LLRW UR Other	15 75 10
Fred Duffy	Geoscientist	UR Other	90 10
Vacant	Health Physicist	LLRW UR Other	45 45 10
Vacant	Geoscientist	LLRW UR Other	75 15 10

[2] The numbers in this column are a qualitative estimate made from observation of the percentage of time each individual spends on the low-level and uranium recovery programs. These are not from a quantitative database.

Table 2: CID, Radioactive Materials Compliance Program			
Name	**Position**	**Area of Effort**	**FTE %**
Hoyt Henry	Radioactive Materials Compliance Program Manager	LLRW UR Other	10 20 70
Muhammadali Abbaszadeh	Radioactive Materials Compliance Program Work Leader/Health Physicist/Inspector	LLRW UR Other	30 30 40
Aaron Houston	Natural Resource Specialist/ Inspector	LLRW UR Other	10 60 30
Clint Burnett	Natural Resource Specialist/ Inspector	LLRW UR Other	30 40 30
Matthew Kufrovich	Health Physicist/ Inspector	LLRW	100
Vacant	Health Physicist/ Inspector	LLRW	100

4. Please provide a listing of all new professional personnel hired into your radioactive materials program since the last review, indicate the date of hire; the degree(s) they received, if applicable; additional training; and years of experience in health physics or other disciplines, as appropriate.

RM Section New Professional Hires

Staff	Date of Hire	Position Title	Degree Earned	Years of Experience
Gehan Flanders	01/01/2021	Section Manager	MS in Environmental Engineering & MS in Environmental Science	21
Yaneth Gamboa	05/01/2021	Health Physicist	Ph.D. Environmental Engineering	13
Molly Coffman	10/01/2021	Engineer	B.S. in Civil Engineering	6
Caitlin Kurwitz	10/11/2021	Health Physicist	B.S. in Biomedical Science	3
Ben Wishert	02/12/2018	Environmental Permit Specialist	B.S. Nuclear Engineering	4
John Haygood	03/18/2019	Health Physicist	M.S. in Health Physics	50

CID, Radioactive Materials Compliance Program New Professional Hires

Staff	Date of Hire	Position Title	Degree Earned	Years of Experience
*Michael Boutwell	09/10/2018	Health Physicist	Bachelor of Science in Nuclear Engineering	Approximately 2 years and 5 months in Radioactive Materials Compliance Program (as of 4/28/2021)
**Gehan Flanders	12/01/2018	Health Physicist	MS in Environmental Engineering & MS in Environmental Science	Approximately 2 years and one month in Radioactive Materials Compliance Program (as of 12/31/2020)
***Aaron Houston	08/05/2019	Natural Resource Specialist	Bachelor of Science in Bioenvironmental	2 years and 5 months in Radioactive Materials Compliance Program (as of January 25, 2022)
****Clint Burnett	07/09/2021	Natural Resource Specialist	Bachelor of Science in Environmental Science	Approximately 4 months in Radioactive Materials Compliance Program (as of January 25, 2022)
*****Matthew Kufrovich	10/04/2021	Health Physicist	Bachelor of Science in Nuclear Engineering	Approximately 3 months in Radioactive Materials Compliance Program (as of January 25, 2022)

* Michael Boutwell left TCEQ on 04/28/2021.

**Gehan Flanders accepted a position with TCEQ Radioactive Materials Division. Ms. Flanders joined RMD on 01/01/2021.

***Prior to joining Radioactive Materials Compliance Program, Mr. Houston worked as an air investigator for 6 years. For two years of the 6 years, Mr. Houston's job functions also included Emergency Response activities.

**** Prior to joining Radioactive Materials Compliance Program, Mr. Burnett worked as an air investigator for 6 years and as a Waste and Emergency Response Investigator for 2 years.

***** Prior to joining Radioactive Materials Compliance Program, Mr. Kufrovich had no work experience related to radiation field, except for the knowledge he acquired through education as a Nuclear Engineer.

5. Please list all professional staff who have not yet met the qualification requirements for aradioactive materials license reviewer or inspector. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.

See Appendix E for Staff Not Yet Qualified

6. Identify any changes to your qualification and training procedure that occurred during thereview period.

A Training Program for Radioactive Materials Inspectors and License Reviewers was developed, using Inspection Manual Chapter (IMC) 1248 as a guide. The initial revision to the training program was completed on January 29, 2020. An additional revision to the training manual was made in February 2021 and the staff received training on the training program manual on September 15, 2021.

7. Please identify the technical staff that left your radioactive materials program during thereview period and indicate the date they left.

Radioactive Materials Section

Name	Position	Date Left Position	Reason for Leaving/Transfer
David Hastings	Uranium Work Leader	12/31/2021	retirement
Anastasia Ozain-Porterie	Health Physicist	11/19/2021	accepted position outside of TCEQ
Deborah Armbruster	Program Coordinator	07/31/2021	retirement
Nicole Traphan	Health Physicist	01/31/2021	accepted position outside of TCEQ
Mohanned Kawasmi	Health Physicist	12/14/2020	accepted position outside of TCEQ
Tony Gonzalez	Uranium Work Leader	11/06/2020	accepted position outside of TCEQ
Ron Thomas	RM Section Manager	10/31/2020	retirement
Bobby Janecka	RM Section Manager	11/14/2018	accepted position outside of TCEQ
Gehan Flanders	Health Physicist	12/01/2018	accepted opportunity within TCEQ
Lynda Clayton	Program Coordinator	09/26/2018	deceased
Charles Maguire	Director	06/30/2018	accepted position outside of TCEQ
Nick Robinson	Intern	12/31/2021	internship ended
Jack McLaughlin	Intern	08/24/2021	internship ended
Patrick Ryan	Contractor	01/31/2021	contract ended
Patrick Ryan	Intern	8/31/2020	internship ended
Javier Ferrandis	Contractor	8/30/2020	contract ended
Kensie Mason	Intern	8/30/2019	internship ended
Kaylee Umberhocker	Intern	8/30/2019	internship ended
Elizabeth Hernandez	Contractor	06/02/2019	accepted position outside of TCEQ
Zelinda Lombrana	Contractor	03/17/2019	accepted position outside of TCEQ
Sarah Alverson	Intern	8/31/2018	internship ended
John Trevino	Intern	8/31/2018	internship ended

CID, Radioactive Materials Compliance Program

Staff	Title	Date Left
Sonia Simmons	Health Physicist	06/30/2018
Karen Bachtel	Natural Resource Specialist	05/31/2019
Gehan Flanders	Health Physicist	12/31/2020
Michael Boutwell	Health Physicist	04/28/2021
Joe Gonzalez	Health Physicist	06/07/2021

8. List any vacant positions in your radioactive materials program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

Radioactive Materials Section, as of January 31, 2022:

Position Title	Date Vacated	Status
Program Coordinator	08/01/2021	Interviews have been completed.
Health Physicist I	11/19/2021	Interviews have been scheduled
Geoscientist V	01/01/2022	Paperwork is under development to submit to TCEQ Human Resources to fill vacancy

CID, Radioactive Materials Compliance Program:
As of January 25, 2022, there is one vacant position for a resident inspector assigned to the Texas Commercial LLRW disposal facility. The position became vacant in June 2021. An

offer to an applicant was accepted in September 2021, but the applicant later withdrew their acceptance. An offer to another applicant was accepted in November 2021, but the applicant later withdrew their acceptance. Another round of interviews for the position was held on January 25, 2022.

9. For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

The TCEQ Radioactive Materials and Critical Infrastructure Divisions are under the jurisdiction of the Executive Director who is hired by and reports to the three TCEQ Commissioners who are appointed by the Governor of Texas and confirmed by the Texas Senate. Additionally, as part of our routine actions (rulemaking, licensing, permitting, etc.) there are opportunities for public input including input from other state and federal agencies. The Texas Radiation Advisory Board (TRAB) holds meetings to review the rules and guides Texas agencies that have programs involving the regulation of radiation. The TRAB provides recommendations to the agencies, the legislature, and the governor. The governor appoints each member of the TRAB in staggered 6-year terms.

II. Status of Materials Inspection Program

10. Please identify individual licensees or categories of licensees the State is inspecting lessfrequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and explain the reason for the difference. The list only needs to include the following information: license category or licensee name and license number, your inspection interval, and rationale for the difference.

The Radioactive Materials Compliance program does not inspect any licensee less frequently than called for in NRC's IMC 2800.

11. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800 and the number of initial inspections that were completed during each year of the review period.

The number of inspections completed during each year of the review period will be made available to the Review Team at the time of the review. There were no initial inspections completed during each year of the review period.

12. Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2,and 3 licensees and initial inspections that were conducted overdue.

    At a minimum, the list should include the following information for each inspection thatwas conducted overdue during the review period:

    (1) Licensee Name
    (2) License Number
    (3) Priority (IMC 2800)
    (4) Last inspection date or license issuance date, if initial inspection
    (5) Date Due
    (6) Date Performed
    (7) Amount of Time Overdue
    (8) Date inspection findings issued

No inspections were conducted overdue during the review period.

13. Please submit a table or computer printout that identifies any Priority 1, 2, and 3 licensees and initial inspections that are currently overdue, per IMC 2800. At a minimum, the list should include the same information for each overdue inspectionprovided for Question 12 plus your action plan for completing the inspection. Alsoinclude your plan for completing the overdue inspections.

Currently, there are no overdue inspections.

14. Please provide the number of reciprocity licensees that were candidates for inspection per year as described in IMC 1220 and indicate the number of reciprocity inspections ofcandidate licensees that were completed each year during the review period.

Not applicable to the TCEQ.

III. Technical Quality of Inspections

15. What, if any, changes were made to your written inspection procedures during thereporting period?

To address the NRC's recommendation from the previous review in 2018, the CID, Radioactive Materials Compliance Program revised its LLRW Disposal Program inspection procedures on March 30, 2018, to specify that inspection results will be communicated to licensees within 30 days of the completion of an inspection. Additional language was added to the inspection procedures as follows: The investigator(s) will make every reasonable effort to adhere to this deadline, unless the deadline cannot be met due to holidays, unexpected circumstances, or other priorities. The investigator(s) will document and discuss the reasons for not meeting the deadline with Critical Infrastructure Division (CID) Management.

To address the NRC's recommendation from the previous review in 2018, the CID, Radioactive Materials Compliance Program revised its UR Program Inspection procedures on March 30, 2018, to specify that inspection results will be communicated to licensees within 30 days of the completion of an inspection. Additional language was added to the inspection procedures as follows: The investigator(s) will make every reasonable effort to adhere to this deadline, unless the deadline cannot be met due to holidays, unexpected circumstances, or other priorities. The investigator(s) will document and discuss the reasons for not meeting the deadline with Critical Infrastructure Division (CID) Management.

The procedures for both programs may be revised based on changes in the licensee's operations, to enhance the inspection program, or other factors that may prompt changes to the procedures.

16. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

Inspector Supervisor License Category Date

Inspector	Supervisor	License Category	Date
Aaron Houston	Muhammadali Abbaszadeh	Uranium & Commercial LLRW Disposal	08/08/2020 09/04/2020 03/16/2021 06/17-18/2021 07/06/2021 07/07/2021 12/21/2021
Clint Burnett	Muhammadali Abbaszadeh	Uranium	12/21/2021
Matthew Kufrovich	Muhammadali Abbaszadeh	Commercial LLRW Disposal	10/04/2021 01/19-20/2022
Muhammadali Abbaszadeh	Hoyt Henry	Radioactive Waste Storage and Processing Non-Commercial LLRW disposal	10/16/2019 No Accompaniment conducted in 2020 11/10/2021

17. Describe or provide an update on your instrumentation, methods of calibration, and laboratory capabilities. Are all instruments properly calibrated at the present time? Werethere sufficient calibrated instruments available throughout the review period?

The TCEQ's inventory of radiation detection instrumentation (instrument) is maintained by both the CID and the RMD. The CID maintains a separate set of instruments. Both sets of instrumentation are either sent to Ludlum Instruments, Inc. (Ludlum) or the Texas Department of State Health Services (DSHS), Radiation Control Program, for calibration. If an instrument does not function properly, it will be sent to Ludlum for repair. The TCEQ does not have laboratory capabilities for calibration.

Instrument calibrations and records are maintained in a paper copy form. The CID and RMD had sufficient calibrated instruments available throughout the review period.

IV. Technical Quality of Licensing Actions

18. How many specific radioactive material licenses does your program regulate at this time?

Currently, the agency regulates a total of four radioactive waste disposal, storage and processing licenses which include the following:

- **One waste storage and processing license**
- **One low-level radioactive waste disposal and radioactive waste storage and processing license**
- **One alternative method of disposal of radioactive materials license**
- **One decommissioning license (currently in mediation to be decommissioned)**

Currently, the agency has a total of 11 uranium licenses which include the following:

- **One byproduct material disposal license**
- **Three licenses that authorize possession of byproduct material in tailings impoundments**
- **Two licenses that authorize in-situ uranium mining and processing**
- **Two licenses that only authorize the processing of uranium to produce yellowcake**
- **Three licenses that only authorize in-situ uranium mining**

19. Please identify any major, unusual, or complex licenses which were issued, received amajor amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.

Low-level Radioactive Waste disposal, storage and processing:

- **Iso-Tex, legacy buried waste site – RW1937 – currently in mediation to be decommissioned**

Uranium:

- **Waste Control Specialists – R05807 – renewal, application dated May 23, 2018 and received on May 31, 2018 – was issued September 15, 2020**
- **URI's Rosita and Vasquez sites are currently undergoing site reclamation and groundwater restoration. No request has been made for license termination or partial termination.**
- **Signal Equities, LLC – R06065 – License Termination application dated April 11, 2018 was received on April 12, 2018. License terminated effective date October 4, 2019.**
- **Former IEC Uranium Recovery Project – TCEQ has continued decommissioning efforts during this review period, including site surveys, soil excavation and homogenization, contaminated soil and concrete disposal, and soil sampling. The site is being decommissioned for eventual release for unrestricted use. The site is currently in litigation.**

20. Discuss any variances in licensing policies and procedures or exemptions from theregulations granted during the review period.

The emergency authorization granted by Texas Commission on Environmental Quality (TCEQ) to Waste Control Specialists (WCS) in 2014 to store transuranic waste from Los Alamos National Laboratory (LANL) in the bottom of the Federal Waste Facility (FWF) at the WCS site is still in effect. This waste was sent to WCS for storage after the Waste Isolation Pilot Plant (WIPP) facility was temporarily closed due to a fire and radiological release. The waste could not be shipped back to LANL or to the WIPP since it was discovered that some of the waste in storage was similar to waste that was involved in the radiological release event at WIPP. Therefore, DOE decided to apply characteristic waste codes to the waste and then proceeded to initiate a series of studies and safety evaluations. The DOE has yet to make a final determination regarding whether to remove the waste codes and transport the waste back to either LANL or to the WIPP.

There have been no variances from 30 TAC 336 "Radioactive Substance Rules" granted to any uranium licensee.

21. What, if any, changes were made in your written licensing procedures (new procedures,updates, policy memoranda, etc.) during the reporting period?

TCEQ's Radioactive Materials Division (RMD) has developed and issued standard operating procedures (SOPs) to address several processes and are used by the section staff which includes both low-level radioactive waste (LLRW) and uranium program areas. These SOPs are reviewed and updated annually, or more frequently as needed to ensure they are current.

The following SOPs have been written or revised since the last IMPEP:

- **General**
  - **Admin Review, 11/10/2020**
  - **Administrative Amendment License Issuance, 02/25/2020**
  - **Annual Invoice, 03/20/2019**
  - **Decommissioning Cost Estimates, 12/15/2020**
  - **Integrated Web Reporting (IWR), 11/10/2020**
  - **Internal Data Applications (IDA) Entry, 04/24/2019**
  - **License Issuance, 02/25/2020**
  - **License Termination, 02/25/2020**
  - **Nuclear Regulatory Commission (NRC) Training, 12/15/2019**
  - **Response to Comments (RTC), 04/03/2019**
  - **RMS Field Phone, 07/11/2019**
- **Sampling**
  - **Ambient Gamma Survey, 04/04/2019**
  - **Chain of Custody (COC), 05/10/2019**
  - **Environmental Dosimetry Exchange, 04/04/2019**
  - **Environmental Sampling Program, 05/01/2019**
  - **Radon Monitoring, 03/04/2019**
  - **Sediment Sampling, 04/04/2019**
  - **Soil Sampling, 04/04/2019**
  - **Surface Water Sampling, 04/04/2019**
  - **Vegetation Sampling, 04/04/2019**
- **Technical**
  - **Conducting Close-Out Surveys, 03/01/2019**
  - **Ecological Review, 03/01/2019**
  - **Engineering Review, 04/05/2019**
  - **Geotechnical Review, 04/05/2019**
  - **Health Physics Review, 04/08/2019**
  - **Socio Economics Review, 03/01/2019**
  - **Technical Review, 11/10/2020**
- **WCS**
  - **Exemption Approval, 03/01/2019**
  - **GoldSim, 03/07/2019**
  - **Manifest Process, 04/05/2019**
  - **Manual License Verification, 03/29/2019**
  - **Notification of Revisions to Waste Acceptance Criteria (WAC) Provisions, 03/01/2019**
  - **Updated Disposal Numbers, 03/01/2019**

Non-significant changes have been made to the following SOPs to update, revise to fix errors, or to provide greater clarity:

- **Admin Complete Public Notice, 02/25/2020**
- **Performance Assessment (PA) Review, 03/01/2019**
- **Compliance History Check, 02/26/2019**
- **Delinquent Fee Search, 05/11/2021**
- **Document Filing Process for 1206, 03/05/2019**
- **Joint Groundwater Monitoring and Contamination Report, 04/09/2019**
- **Import Petitions (and Creating Certification Letters), 07/13/2020**
- **Procedure Change Request, 04/01/2019**
- **Searching the Secretary of State (SOS) Web site, 02/26/2019**
- **Technical Complete Public Notice, 02/25/2020**

The following was created due to the passage of House Bill 2203 by the Texas 86th Legislative Session – 2019 which relates to notice of a radioactive substance release.

- **Radioactive Substance Release Notifications, 02/11/2020**

The following SOPs are in the process of being finalized due to a policy of reviewing SOPs to ensure they are relevant and up to date. The following SOPs have been updated to have a consistent format, add applicable rules, define work responsibilities, and add links to other relevant SOPs:

- **Administrative Review of Radioactive Material License Applications (RM-2.01)**
- **Decommissioning Cost Estimates (RM-3.10)**
- **Engineering Review (RM-3.03)**
- **Geotechnical Review (RM-3.02)**
- **Health Physics Review (RM-3.04)**

- License Issuance (RM-3.09)
- License Technical Review (RM-3.01)
- Routing and Filing (RM-1.03)
- Technical Complete Public Notice (RM-3.07)

No new policy memoranda have been issued since the 2018 IMPEP review.

22. Identify by licensee name and license number any renewal applications that have beenpending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

Low-level Radioactive Waste disposal, storage and processing:

R01811 – Nuclear Sources and Services Inc. (NSSI) - The renewal date for radioactive material license R01811 was June 30, 1995. The renewal has been pending since that time. The renewal of this license was delayed due to the issue of insufficient financial assurance by the licensee. The Division did not renew the license because the licensee did not provide sufficient financial assurance between 1996 and 2004. The financial assurance issue was settled in a State Office of Administrative Hearings court in 2004. Up until June 2007, R01811 was under the jurisdiction of Texas Department of State Health Services (DSHS). Senate Bill (SB) 1604 of the 80th Texas Legislature transferred this license to the TCEQ in June 2007. One of the provisions of SB 1604 was that the pending license applications for the by-product and the LLRW disposal facilities were given priority to meet specific deadlines. Consequently, the technical review of the renewal application for NSSI was delayed. A revised renewal application was received on November 10, 2008. A technical notice of deficiency (TNOD) was sent to NSSI on June 29, 2010. The response from NSSI was reviewed and a draft second TNOD was prepared which was sent to NSSI for their review. Staff traveled to Houston to meet with NSSI on November 28, 2017 to discuss the second TNOD and the path forward to completing the license renewal. The review of NSSI's response to the NODs was completed and accepted in August 2018, but the renewal was put on hold until NSSI completed facility upgrades to satisfy the fire protection classification requirements in the rules for facilities used for radioactive waste processing. TCEQ sent a letter in September 2019 accepting that these upgrades have been completed. However, the renewal was put on hold again due to an inspector's finding about insufficient documentation of stored radioactive waste, which affects the calculations for determining the financial assurance. This inspector's finding has not been corrected by NSSI yet. A path forward to issuing the renewal is under discussion and will include new financial assurance calculations.

Uranium Recovery:

R01634 – ConocoPhillips, Conquista Project – The licensee submitted a renewal application dated September 10, 1980 and qualified for "timely renewal" status. The renewal application has not been processed since the site is closed and under decommissioning. The license continues to exist under the provisions of 30 TAC 336.1117(b). The licensee submitted a major amendment in 2015 which includes the creation of a supplemental disposal cell for contaminated soil along the adjacent road shoulder and the Slick Wilcox site. The amendment submittal is pending because the licensee indicated that groundwater issue is its priority. The licensee reestablished groundwater background values of hazardous constituents for groundwater protection standards of the uppermost aquifer.

R01431 – ExxonMobil, Ray Point Project – The licensee submitted a renewal application dated June 25, 1982, and qualified for "timely renewal" under the provisions of 30 TAC 336.1117(b). The renewal application has not been processed since the site is closed and under decommissioning. The license continues to exist under the provisions of 30 TAC 336.1117(b). The Licensee submitted a Groundwater Characterization Report for demonstration that groundwater within the saturated clay formation is not in an aquifer. The licensee submitted a minor amendment application in 2021 for removal of groundwater compliance conditions under the license. The application is in process.

R02402 – RGR, Panna Maria Project – The licensee submitted a renewal application dated September 22, 2006 and qualified for "timely renewal" status. The renewal application has not been processed since the site is closed and under decommissioning. The license continues to exist under the provisions of 30 TAC 336.1117(b). The licensee submitted a major amendment application for revising groundwater protection standards and the groundwater monitoring program, which was finalized with a license amendment issued in January 2019.

R03626 – South Texas Mining Venture, Hobson Project – The license renewal application dated September 21, 1990, which qualified for "timely renewal" under the provisions of 30 TAC 336.1117(b). On October 31, 2017, the licensee submitted supplemental information that is currently under technical review. An administrative notice of deficiency was sent to the licensee May 4, 2018, delaying the continuation of the administrative completeness review until the licensee submitted sufficient information. The renewal application was found administratively complete on September 10, 2018. Additional information was needed from the licensee on five occasions regarding technical memos and the radiation protection manual to continue the renewal application technical review. The last of the additional information requested was received November 12, 2021 and is currently under review.

R06062 - South Texas Mining Venture, La Palangana - The licensee submitted the renewal application for the R06062 La Palangana license on August 7, 2019 and qualified for "timely renewal" under the provisions of 30 TAC 336.1117(b). TCEQ completed the technical review and a request for additional information (RAI) was sent to the licensee in a letter dated April 30, 2021 requesting information on the October 29, 2019 Radiation Protection Reference Manual. The renewal application is under review.

R03653 – URI Kingsville Dome (KVD), Rosita, & Vasquez Projects – The licensee submitted a renewal application dated November 5, 1999 and qualified for "timely renewal" under the provisions of 30 TAC 336.1117(b). Currently, there is no production of uranium at the site. The renewal application was under the jurisdiction of Texas Department of State Health Services (DSHS) from 2000 through July 1, 2007 when the license was transferred to the TCEQ. The DSHS sent a letter to the licensee on June 1, 2005 requesting additional information needed to continue the review. The TCEQ has no record of the licensee's response to the DSHS request.

During a meeting on January 19, 2022 with the licensee and its consultants, the TCEQ recommended that the licensee re-submit valid, true, accurate, and complete information for review and issuance of the renewal in a timely manner. According to the licensee, they are preparing a supplemental application package to be submitted to the TCEQ by the end of the first quarter of 2022.

R05360 – EFR Alta Mesa Project – The licensee submitted a renewal application dated September 9, 2009 and qualified for "timely renewal" status. The license continues to be effective under the provisions of 30 TAC 336.1117(b). The renewal application was determined to be administratively complete on January 12, 2010. The license renewal is under review.

TCEQ Plan for the Elimination of the Backlog

After assessing the scope of the backlog, a plan was put in place to not only reduce the renewal backlog, but to also eliminate it, and to prevent it from recurring in the future. These changes included in part, the assignment of staff to each individual site, to act as the Project Manager for that site, and to be responsible for all activities related to that site. Staff now have ownership of each of the sites and are responsible for meeting assigned due dates; for frequent communication between representatives of each site and TCEQ management; and for collecting and maintaining records associated with each site, including timely database entry. Project managers are responsible for the submission of weekly reports including communication and other information to allow TCEQ management to track staff activities, ensuring that deadlines are met. Weekly section meetings are held where each Project Manager provides updates on their respective sites, including key activities and progress toward meeting project goals. TCEQ managers are responsible for assessing all work submitted, ensuring that deadlines are met, and that the backlog continues to be reduced with the overall goal of backlog elimination. However, it should be noted that there are often circumstances beyond TCEQ's control that can contribute to the backlog.

V. Technical Quality of Incident and Allegation Activities

23. For Agreement States, please provide a list of any reportable incidents not previouslysubmitted to NRC (See Procedure SA-300, *Reporting Material Events*, for additional guidance, OMB clearance number 3150-0178). The list should be in the following format:

Licensee Name License # Date of Incident/Report Type of Incident

There was no incident since the previous review that met the reporting requirements specified in SA-300.

Allegations

On 3/6/2020, the NRC referred an allegation to the TCEQ for investigation. The information is listed in the Table below.

Licensee Name/ License No.	Date of Allegation
Waste Control Specialists/R04100	03/06/2020

On 11/23/2020, the NRC referred an allegation raised by a concerned individual to both DSHS and the TCEQ. This complaint was related to a TCEQ regulated entity, but the site is not regulated under TCEQ's radioactive materials program. DSHS as the lead agency, conducted an investigation in coordination with the appropriate TCEQ regional office.

24. Identify any changes to your procedures for responding to incidents and allegations thatoccurred during the period of this review.

None

C. NON-COMMON PERFORMANCE INDICATORS

I. Compatibility Requirements

25. Please list all currently effective legislation that affects the radiation control program.Denote any legislation that was enacted or amended during the review period.

Legislation and rules directly affecting the TCEQ radiation control program include:

- The Texas Radiation Control Act, Chapter 401, Texas Health & Safety Code
- Texas Low-Level Radioactive Waste Disposal Compact Act, Chapter 403, Texas Health & Safety Code
- Title 30 Texas Administrative Code Chapter 336, Radioactive Substance Rules

Legislation indirectly affecting the TCEQ radiation control program includes:

- The Texas Open Meetings Act: requires meetings of governmental bodies to be open to the public, except for expressly authorized closed sessions, and to be preceded by public notice of the time, place, and subject matter of the meeting. All programs of the TCEQ are required to hold meetings according to this Act.
- The Texas Public Information Act: provides a mechanism for citizens to inspect or copy government records. It also provides that governmental bodies may withhold government records from the public in specific instances. All programs of the TCEQ are required to provide information to the public according to the requirements of this Act.
- The Texas Administrative Procedure Act: to provide minimum standards of uniform practice and procedure for state agencies, to provide for public participation in the rulemaking process, and to restate the law of judicial review of state agency action.
- Texas Water Code, Chapter 5: the purpose of this chapter is to provide an organizational structure for the TCEQ and to define the duties, responsibilities, authority, and functions of the commission and the executive director.
- Texas Water Code, Chapter 27: the purpose of this chapter is to regulate underground injection wells, which applies to the RMD because of the use of underground injection wells by various licensees.
- Texas Environmental Audit Privilege Act: certain documents and information gathered as part of an environmental self-audit are privileged from disclosure. The Audit Act also provides certain immunities from administrative or civil penalties for violations voluntarily disclosed and corrected within a reasonable amount of time.
- Texas Regulatory Takings Act: This involves rulemaking. Rulemaking documents have a section explaining how this rulemaking does not involve a regulatory taking. The Texas Constitution states that “no person's property shall be taken, damaged, or destroyed for or applied to public use without adequate compensation being made, unless by the consent of such person” (defined as a regulatory taking). This Act affects the rulemaking process to ensure that the rulemaking does not constitute a regulatory taking.
- Uranium Mill Tailings Radiation Control Act: A United States environmental law that amended the Atomic Energy Act of 1954 and authorized the Environmental Protection Agency to establish health and environmental standards for the stabilization, restoration, and disposal of uranium mill waste. This affects how we close uranium sites since this Act gives the responsibility and ownership of closed uranium sites to the Department of Energy
- Coastal Zone Management Act: to protect the coastal environment from growing demands associated with residential, recreational, commercial, and industrial uses. Provides extra requirements for licensees that are close to the coast and can affect the environment of the coast.
- Texas Solid Waste Disposal Act: Chapter 361 of the Texas Health and Safety Code states that the purpose of this chapter is to safeguard the health, welfare, and physical property of the people and to protect the environment by controlling the management of solid waste, including accounting for hazardous waste that is generated.

Texas 86th Legislative Session – 2019:

House Bill 2203 was passed, relating to notice of a radioactive substance release. The legislation amended the Texas Health & Safety Code Section 501.0245 to require TCEQ and DSHS to immediately provide notice of a report of a release of a radioactive substance into the environment to each political subdivision of this state into which the substance was released.

Texas 87th Legislative Session, Second Special Session – 2021:

House Bill 7 was passed, relating to the storage or disposal of high-level radioactive waste. The legislation amended the Texas Health and Safety Code Section 401.0525 to forbid the TCEQ from issuing a general construction permit, approving a Stormwater Pollution Prevention Plan, or issuing a permit under the Texas Pollutant Discharge Elimination System Program for the construction or operation of a facility that is licensed for the storage of high-level radioactive waste, except for a facility located at the site of currently or formerly operating nuclear power reactors and nuclear research and test reactors operated by a university. The legislation also amended the Texas Health and Safety Code Section 401.072 to forbid the disposal or storage of high-level radioactive waste in Texas except for a facility located at the site of currently or formerly operating nuclear power reactors and nuclear research and test reactors operated by a university.

26. Are your regulations subject to a "Sunset" or equivalent law? If so, explain andinclude the next expiration date for your regulations.

30 Texas Administrative Code (30 TAC) Chapter 336: Radioactive Substance Rules is the State rule regulating radioactive materials under TCEQ authority. All TCEQ rules are subject to a quadrennial review (quad review). The purpose of the quad review is to determine if TCEQ rules are still relevant and needed. The quad review will also determine if any changes are needed to the rules. The next quad review for 30 TAC Chapter 336 is expected to be initiated in 2022. Every 12 years, every state agency, including the TCEQ, undergoes a Sunset review in which the Legislature examines the agency's mission, priorities, and performance and take action to address problems identified. The Sunset review of TCEQ is currently ongoing.

27. Please review and verify that the information in the enclosed State Regulation Status (SRS) sheet is correct. For those regulations that have not been adopted by the State,explain why they were not adopted, and discuss actions being taken to adopt them. If legally binding requirements were used in lieu of regulations and they have not been reviewed by NRC for compatibility, please describe their use.

The contents of the SRS sheet, as it is currently published on the NRC agency website, is not correct. Text for two Regulation Amendment Tracking System Identification Numbers (RATS ID) were removed from the SRS sheet in the last NRC letter to TCEQ, dated December 11, 2020, which were in the prior NRC letter, dated May 20, 2019 (as documented in the table below). The removal of this text changed the status of these RATS from being completed to pending.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
As Correctly Stated in May 20, 2019 letter					
2018-1	Medical Use of Byproduct Material – Medical Event Definitions, Training and Experience, and Clarifying Amendments, 10 CFR Parts 30, 32 and 35	01/14/2022			TX DSHS Responsibility
2018-2	Miscellaneous Corrections - Organizational Changes 10 CFR Parts 37, 40, 70 and 71	12/21/2021	Final ML19136A247	No Comments 05/20/2019 ML19136A241	
As shown in the December 11, 2020 letter					
2018-1	Medical Use of Byproduct Material – Medical Event Definitions, Training and Experience, and Clarifying Amendments, 10 CFR Parts 30, 32 and 35	01/14/2022			
2018-2	Miscellaneous Corrections - Organizational Changes 10 CFR Parts 37, 40, 70 and 71	12/21/2021			

As of the date of this review, there are three outstanding items on the TCEQ SRS (as shown in the

table below). RATS 2018-3 and 2019-1 are currently in rulemaking with a letter sent to the NRC on November 17, 2021 to review the proposed rulemaking. The NRC identified three modifications required to maintain compatibility, which were incorporated into the final rules that will be adopted. Adoption date is expected to be effective on May 19, 2022. No rulemaking will be needed for RATS 2020-3 but the letter has not yet been submitted to the NRC for the NRC to review and confirm this conclusion.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2018-3	Miscellaneous Corrections 10 CFR Parts 1, 2, 34, 37, 50, 71, 73, and 140	07/30/2022			
2019-1	Miscellaneous Corrections 10 CFR Parts 2, 21, 37, 50, 52, 73, and 110	12/18/2022			
2020-3	Miscellaneous Corrections 10 CFR Parts 1, 2, 19, 20, 21, 30, 34, 35, 40, 50, 51, 52, 60, 61, 62, 63, 70, 71, 72, 73, 74, 75, 76, 110, and 140	11/16/2023			

28. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated tocomplete each step.

The average TCEQ rulemaking takes approximately one year. The time frame is required to provide staff adequate time to develop the rule project, all levels of management adequate time to review and discuss, the public adequate time to review and comment, and staff adequate time to revise as needed. TCEQ rulemaking is divided into three phases including the concept memo stage, the proposal phase, and the adoption phase.

The concept memo stage takes 2-3 months and includes staff initiated or legislatively directed development of a rule project which identifies all sections that need to be amended.

The proposal phase takes 4-5 months and includes staff fully developing all documents required for a rule project, including a fiscal analysis. All documents are reviewed and approved by executive management prior to being released to the public. There is a legally mandated 19-day public notice requirement before the rule project can be considered by the Commission at a Commissioners' Agenda meeting. If the rule project is approved to move forward, it is filed with the Secretary of State (SOS) for publication. This takes 2 ½ weeks based on the SOS publication schedule. The comment period is typically at least 30 days.

The adoption phase takes 4-5 months and includes responding to any comments received and preparing all documents which are then approved by executive management. There is a legally mandated 19-day public notice requirement before the rule project can be adopted by the Commission at a Commissioners' Agenda meeting. If the rule project is approved for adoption, it is filed with the SOS for publication. This takes 2 ½ weeks based on the SOS publication schedule. The rule is effective 20 days after it is filed with the SOS.

If there is a need for stakeholder input, that adds an additional 2-3 months to allow for meaningful collaboration between the agency and stakeholders. After the stakeholder meeting is held, time is then allowed for the public and stakeholders to provide comments and feedback back to the agency. Agency staff will then review the comments and discuss possible revisions with management before proceeding.

II. Sealed Source and Device (SS&D) Evaluation Program

29. Prepare a table listing new and amended (including transfers to inactive status) SS&D registrations of sources and devices issued during the review period. The table headingshould be:

SS&D Registry Number	Manufacturer, Distributor or Custom User	Product Type or Use	Date Issued	Type of Action

30. Please include information on the following questions in Section A, as they apply to theSS&D Program:

Sealed Source and device evaluation is not under TCEQ jurisdiction

III. Low-level Radioactive Waste Disposal Program

31. Please include information on the following questions in Section A, as they apply to the Low-Level Radioactive Waste Disposal Program:

Technical Staffing and Training - Questions 2-9

See responses under Questions 2-9

Status of Materials Inspection Program - Questions 10-14

See responses under Questions 10-14

Technical Quality of Inspections - Questions 15-17

See responses under Questions 15-17

Technical Quality of Licensing Actions - Questions 18-22

See responses under Questions 18-22

Technical Quality of Incident and Allegation Activities - Questions 23-24
See responses under Questions 23-24

IV. Uranium Recovery Program

32. Please include information on the following questions in Section A, as they apply to the Uranium Recovery Program:

Technical Staffing and Training - Questions 2-9

See responses under Questions 2-9

Status of Materials Inspection Program - Questions 10-14

See responses under Questions 10-14

Technical Quality of Inspections - Questions 15-17

See responses under Questions 15-17

Technical Quality of Licensing Actions - Questions 18-22

See responses under Questions 18-22

Technical Quality of Incident and Allegation Activities - Questions 23-24

See responses under Questions 23-24

MATERIALS REQUESTED TO BE AVAILABLE FOR
THE ON-SITE PORTION OF AN IMPEP REVIEW

Please have the following information available for use by the IMPEP review team when they arrive at your office:

- List of open license cases, with date of original request, and dates of follow-up actions.
- List of licenses terminated during review period.
- Copy of current log or other document used to track licensing actions.
- List of all licensing actions completed during the review period (sorted by license reviewer, if possible).
- Copy of current log or other document used to track inspections.
- List of all inspections completed during the review period (sorted by inspector, if possible).
- List of inspection frequencies by license type.
- List of all allegations occurring during the review period. Show whether the allegation is open or closed and whether it was referred by NRC.
- List of all licenses that your agency has imposed additional security requirements upon.

ALSO, PLEASE HAVE THE FOLLOWING DOCUMENTS AVAILABLE:

- All State regulations
- Statutes affecting the regulatory authority of the State program
- Standard license conditions
- Technical procedures for licensing, model licenses, review guides
- SS&D review procedures, guides, and standards
- Instrument calibration records
- Inspection procedures and guides
- Inspection report forms
- Documented training plan, if applicable
- Records of results of supervisory accompaniments of inspectors
- Emergency plan and communications list
- Procedures for investigating allegations
- Procedures for investigating incidents
- Enforcement procedures, including procedures for escalated enforcement, severity levels, civil penalties (as applicable)
- Job descriptions

Appendix E: Staff Not Yet Qualified

Radioactive Materials Section

Name	Qualification Requirements Currently in Progress	NRC Courses/Alternative Training Remaining	Anticipated Completion Date
Caitlin Kurwitz	Uranium Recovery Project Manager and Technical Reviewer	MARSSIM Self-Study (H-121S)	02/18/2022
		Characterization and Planning for Decommissioning Self-Study (H-115S)	03/18/2022
		Introductory Health Physics Self-Study (H-117S)	02/11/2022
		Fundamental Health Physics Self-Study (H-122S)	By end of 2023
		Licensing Procedures (G-109)	By end of 2022
		Advanced Health Physics (H-201)	By end of 2023
		Environmental Monitoring for Radioactivity (H-111)	By end of 2023
		Transportation of Radioactive Materials Self-Study (H-308S)	By end of 2023
		Health Physics for Uranium Recovery (F-104)	11/18/2022
		Federal Regulations and Guidance (ISA-5)	02/01/2022
		Individual Study Activity State Statutes, Regulations, and Procedures (ISA-6)	By end of 2022
		(OJT-1) Site Visits	**should be completed in 2022**

Name	Qualification Requirements Currently in Progress	NRC Courses/Alternative Training Remaining	Anticipated Completion Date
Molly Coffman	Uranium Recovery Project Manager and Technical Reviewer	MARSSIM Self-Study (H-121S),	01/20/2022
		Characterization and Planning for Decommissioning Self-Study (H-115S)	03/31/2022
		Introductory Health Physics Self-Study (H-117S)	02/18/2022
		Fundamental Health Physics Self-Study (H-122S)	10/01/2022
		Licensing Procedures (G-109)	By end of 2022
		Environmental Monitoring for Radioactivity (H-111)	By end of 2023
		Transportation of Radioactive Materials Self-Study (H-308S)	By end of 2023
		Health Physics for Uranium Recovery (F-104)	11/18/2022
		(ISA-5) Federal Regulations and Guidance	02/01/2022
		Individual Study Activity State Statutes, Regulations, and Procedures (ISA-6)	By end of 2022
		(OJT-1) Site Visits	**should be completed in 2022**

Name	Qualification Requirements Currently in Progress	NRC Courses/Alternative Training Remaining	Anticipated Completion Date
Yaneth Gamboa	Uranium Recovery Project Manager and Technical Reviewer	MARSSIM Self-Study (H-121S), Characterization and Planning for Decommissioning Self-Study (H-115S) Introductory Health Physics Self-Study (H-117S) Fundamental Health Physics Self-Study (H-122S) Licensing Procedures (G-109) Advanced Health Physics (H-201) Environmental Monitoring for Radioactivity (H-111) Transportation of Radioactive Materials Self-Study (H-308S) Health Physics for Uranium Recovery (F-104) Federal Regulations and Guidance (ISA-5) Individual Study Activity State Statutes, Regulations, and Procedures (ISA-6) (OJT-1) Site Visits	03/31/2022 03/18/2022 03/31/2022 By end of 2023 By end of 2022 By end of 2023 By end of 2023 By end of 2023 11/18/2022 01/31/2022 01/31/2022 **should be completed in 2022**

CID, Radioactive Materials Compliance Program

Staff	NRC Courses/Alternative Training Remaining	Tentative Timeline for Completion
*Aaron Houston	Licensing Procedures Other training as needed	Open
**Clint Burnett	Transportation of Radioactive Materials Inspection Procedures Materials Control & Security System & Principles Licensing Procedures Other training as needed	2022-2023 Open
***Matthew Kufrovich	Transportation of Radioactive Materials Inspection Procedures Materials Control & Security System & Principles Licensing Other training as needed	2022-2023 Open

* Due to COVID-19 Pandemic, Aaron Houston was not able to fully qualify as an inspector. Mr. Houston has completed the initial NRC required courses and will continue to attend other training courses (depending on the availability) as needed. Mr. Houston has not completed the required on the job training due to COVID-19 Pandemic. It is expected that Mr. Houston will be fully qualified as an inspector by the third or fourth quarter of 2022 to conduct Radioactive Material License inspections independently. Mr. Houston has been provided on the job training by the CID's former qualified inspector and the current CID

senior/qualified inspector. Mr. Houston continues to be accompanied/supervised by the CID senior/qualified inspector when performing inspections until fully qualified.
** Since the date of hire on 9/7/2021, Clint Burnett has been taken various training courses, including NRC training courses. Mr. Burnett will be scheduled (depending on the availability) to attend the NRC courses in 2022-2023. Mr. Burnett has accompanied and continues to accompany other CID inspectors, including the CID's senior/qualified inspector for the purpose of on-the-job training and enhancement of his knowledge related to the performance of radioactive material license inspections. Mr. Burnett continues to be accompanied/supervised by the CID senior/qualified inspector when performing inspections until fully qualified.

*** Since the date of hire on 10/04/2021, Matthew Kufrovich has been conducting Waste shipment inspections at the Texas Commercial Low Level Radioactive waste disposal site under the supervision of CID's senior/qualified inspector, including on the job training. Mr. Kufrovich has started the process for attending NRC training. Mr. Kufrovich will continue (depending on the availability) to attend the NRC courses in 2022. Mr. Kufrovich continues to be accompanied/supervised by the CID senior/qualified inspector when performing inspections until fully qualified.